

	)	
Investigation by the Department of Telecommunications	)	
and Energy on its own Motion into the Appropriate Pricing,	)	
based upon Total Element Long-Run Incremental Costs,	)	D.T.E. 01-20
for Unbundled Network Elements and Combinations of	)	
Unbundled Network Elements, and the Appropriate Avoided	)	
Cost Discount for Verizon New England, Inc.	)	
d/b/a Verizon Massachusetts' Resale Services in the	)	
Commonwealth of Massachusetts	)	
	)	

Verizon Massachusetts (“Verizon MA”) requests that the Department extend the judicial appeal period to 20 days after the final Department ruling in the compliance phase of this proceeding.<sup>1</sup> On January 14, 2002, the Department issued its decision on the parties’ motions for reconsideration and clarification and Verizon MA is now required to complete and file its compliance filing, setting forth the costs and rates that are computed in accordance with the Department’s decision. Because of the broad scope and complexity of the issues addressed by the Department, the compliance filing will require careful Department review to determine its consistency with the Department’s decisions in the case.

<sup>1</sup> The Department initially extended the judicial appeal period until 20 days after the Department issued its decision on any motions for reconsideration or clarification that may be filed as a result of the

considered in their entirety, the total impact on Verizon MA cannot be determined. Thus, depending on the outcome of all administrative determinations relating to the compliance phase of the proceeding, parties may or may not file for judicial review. By granting Verizon MA's request to extend the judicial appeal period to a period 20 days after the final Department decision in this compliance phase, the Department does nothing more than preserve parties' rights to appeal until after the compliance phase is completed. This would avoid the filing of an appeal before parties know the final outcome of the case and can determine the impact of all of the Department's decisions.

WHEREFORE, for the reasons set forth above, Verizon MA requests that the Department grant an extension of the judicial appeal period to 20 days after the final Department ruling on all compliance matters in this proceeding.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorneys,

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Dated: January 17, 2003

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Department's final Order in Part A ("Part A Order"). *Order on Motion to Extend Judicial Appeal Period* (July 30, 2002).